

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**SYMBOLOGY INNOVATIONS LLC**

**Plaintiff,**

**v.**

**VALVE CORPORATION, GEARBOX  
SOFTWARE, L.L.C.,**

**Defendants.**

**Civil Action No. 2:23-cv-419-JRG-RSP**

**Jury Trial Requested**

**JOINT (AGREED) MOTION REGARDING PLAINTIFFS’ SUR-REPLY IN  
OPPOSITION TO VALVE’S MOTION TO DISMISS FOR IMPROPER VENUE**

Plaintiffs<sup>1</sup> and Defendant Valve Corporation (“Valve”) file this Joint Motion regarding Plaintiffs’ sur-reply in opposition to Valve’s motion to dismiss (Dkt. 69). The parties have agreed to the following provisions:

Valve does not oppose Plaintiffs filing a “corrected sur-reply” solely to clarify a citation error on pg. 2 n.2, provided that Plaintiffs file their corrected sur-reply by May 15, 2024.

Plaintiffs’ do not oppose Valve filing a sur-sur-reply to respond to arguments made for the first time in Plaintiffs’ sur-reply, provided that Valve’s sur-sur-reply is limited to five pages and is filed within five days of Plaintiffs’ corrected sur-reply.

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<sup>1</sup> Per the Court Order consolidating briefing on Valve’s motion to dismiss (Dkt. 24), the briefing in this case applies with equal force to Valve’s motion to dismiss for improper venue in *Social Positioning Input Systems, LLC v. Valve Corp. et al*, 23-422 (E.D. Tex. Sept. 18, 2023) and *Quantum Technology Innovations v. Valve Corp. et al.*, 23-425 (E.D. Tex. Sept. 18, 2023). The parties use of the term “Plaintiffs” refers collectively to Plaintiffs in these three cases, Symbology Innovations, Social Positioning Input Systems, and Quantum Technology Innovations.

Having agreed upon the terms above and shown good cause, the parties respectfully request the Court grant this Motion and (1) allow Plaintiff's to file a "corrected sur-reply" to clarify a citation error on pg. 2 n.2, and (2) allow Valve leave to file a sur-sur-reply in support of Valve's motion to dismiss (Dkt. 69) that is limited to no more than five pages.

Dated: May 14, 2024

Respectfully submitted,

/s/ Shaun W. Hassett, with permission for  
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**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies pursuant to Local Rule CV-7(h) that the relief requested in this motion is agreed.

/s/ Shaun W. Hassett  
Shaun W. Hassett